EPA/FACILITY SPCC INSPECTION REVIEW North Pacific Seafoods – Red Salmon Cannery Naknek, Alaska 99633			
SPCC RULE REFERENCE	**PLAN**	**FIELD**	**INSPECTION DEFICIENCY DESCRIPTION (August 2, 2017)**
112.5(a) Plan Amendments	X	NA	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1 (b)? If YES, was the Plan amended within six months of the change? ***"Two tanks were removed and one added in 2016. Facility also added two new waste oil tanks."***
112.7(a)(3)(ii) & (iv) Discharge Prevention Measures & Counter-measures		X	Plan addresses each of the following: • Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.); and • Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources).
112.7(f) Training		X	Personnel, training, and oil discharge prevention procedures: • Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan. • Person designated as accountable for discharge prevention at the facility and reports to facility management. • Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in 112.1(b) or failures, malfunctioning components, and any recently developed.
112.8(c)(2) Secondary Containment Sufficiency	X	X	Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation. Diked areas sufficiently impervious to contain discharged oil OR alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond. ***"Secondary containment had cracks."***
112.8(c)(6) Tank Integrity Testing	X	X	• Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing. • Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards. • The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design. • Comparison records of aboveground container integrity testing are maintained. • Container supports and foundations regularly inspected.

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			• Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. • Records of all inspections and tests maintained.
112.8(c)(8) Liquid Level Sensing		X	Each container is equipped with at least one of the following for liquid level sensing: • High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities; • Direct audible or code signal communication between container gauger and pumping station; • Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers; • High liquid level pump cutoff devices set to stop flow at a predetermined container content level; or • Regularly test liquid level sensing devices to ensure proper operation.
112.8(d)(3) Pipe Supports	X	X	Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction.

Spill Prevention Control and Countermeasure Inspection
Findings, Alleged Violations, and Proposed Penalty Form

These Findings, Alleged Violations and Penalties are issued by EPA Region 10 under the authority vested in the Administrator of EPA by Section 311(b)(6)(B)(I) of the Clean Water Act, as amended by the Oil Pollution Act of 1990.

Company Name:	**Docket Number:**
North Pacific Seafoods	CWA-10-2018-0277
Facility Name:	**Penalty Form Date:**
North Pacific Seafoods – Red Salmon Cannery	April 26, 2018
Address:	**Inspection Date:**
Mile Marker 1.5 Alaska Peninsula Hwy	August 2, 2017
City:	**Inspector Name:**
Naknek	Bob Whittier
State:	**EPA Approving Official:**
Alaska	Edward J. Kowalski
Zip Code:	**Enforcement Contact:**
99633	Kate Spaulding

Summary of Findings
(Bulk Storage Facilities)
GENERAL TOPICS: §112.3(a), (d), (e); §112.5(a), (b), (c); §112.7 (a), (b), (c), (d)
(When the SPCC Plan review penalty exceeds $1,500 enter only the maximum allowable of $1,500.)

☐	No Spill Prevention Control and Countermeasure Plan -*112.3*	**$1,500**
☐	Plan not certified by a professional engineer- *112.3(d)*	**$450**
☐	Certification lacks one or more required elements - *112.3(d)*	**$100**
☐	Plan not maintained on site (if manned at least four (4) hrs/day) or not available for review- *112.3(e)(1)*	**$300**
☒	No plan amendment(s) if the facility has had a change in: design, construction, operation, or maintenance which affects the facility's discharge *potential- 112.5(a)*	**$75**
☐	No evidence of five-year review of plan by owner/operator - *112.5(b)*	**$75**
☐	Amendment(s) not certified by a professional engineer- *112.5(c)*	**$150**
☐	No management approval of plan- *112.7*	**$450**

☐	Plan does not follow sequence of the rule and/or cross-reference not provided - *112.7*	**$150**
☐	Plan does not discuss additional procedures/methods/equipment not yet fully operational- *112.7*	**$75**
☐	Plan does not discuss conformance with SPCC requirement- *112.7(a)(1)*	**$75**
☐	Plan does not discuss alternative environmental protection to SPCC requirements - *112.7(a)(2)*	**$200**
☐	Plan has inadequate or no facility diagram,- *112.7(a)(3)*	**$75**
☐	Inadequate or no listing of type of oil and storage capacity of containers- *112.7(a)(3)(i)*	**$50**
☒	Inadequate or no discharge prevention measures- *112.7(a)(3)(ii)*	**$50**
☐	Inadequate or no description of drainage controls- *112.7(a)(3)(iii)*	**$50**
☐	Inadequate or no description of countermeasures for discharge discovery, response and cleanup- *112.7(a)(3)(iv)*	**$50**
☐	Methods of disposal of recovered materials not in accordance with legal requirements- *112.7(a)(3)(v)*	**$50**
☐	No contact list & phone numbers for response & reporting discharges- *112.7(a)(3)(vi)*	**$50**
☐	Plan has inadequate or no information and procedures for reporting a discharge - *112.7(a)(4)*	**$100**
☐	Plan has inadequate or no description and procedures to use when a discharge may occur - *112.7(a)(5)*	**$150**
☐	Inadequate or no prediction of equipment failure which could result in discharges- *112.7(b)*	**$150**
☐	Plan does not discuss and facility does not implement appropriate containment/diversionary structures/equipment- *112.7(c)*	**$400**
☐	Inadequate containment or drainage for Loading Area - *112.7(c)*	**$400**
☐	Plan has no or inadequate discussion of any applicable more stringent State rules, regulations, and guidelines -*112.7(j)*	**$75**
☐	Plan does not include a signed copy of the Certification of the Applicability of the Substantial Harm Criteria per 40 CFR Part 112.20(e)	**$150**
	-If claiming impracticability of appropriate containment/diversionary structures:	
☐	Impracticability has not been clearly denoted and demonstrated in plan - *112.7(d)*	**$100**
☐	No periodic integrity and leak testing- *112.7(d)*	**$150**
☐	No contingency plan - *112.7(d)(l)*	**$150**
☐	No written commitment of manpower, equipment, and materials - *112.7(d)(2)*	**$150**
☐	Plan has no or inadequate discussion of general requirements not already specified - *112.7*	**$75**
	QUALIFIED FACILITY REQUIREMENTS: §112.6	
☐	Qualified Facility: No Self certification - *112.6(a)*	**$450**

☐	Qualified Facility: Self certification lacks required elements- *112.6(a) or (b)*	**$100**
☐	Qualified Facility: Technical amendments not certified - *112.6(a) or (b)*	**$150**
☐	Qualified Facility: Qualified Facility Plan includes alternative measures not certified by licensed Professional Engineer- *112.6(b)*	**$150**
☐	Facility: Environmental Equivalence or Impracticability not certified by licensed Professional Engineer-*112.6(b)(4)*	**$350**
	WRITTEN PROCEDURES AND INSPECTION RECORDS: §112.7(e)	
☐	Plan does not include inspections and test procedures in accordance with 40 CFR Part 112- *112.7(e)*	**$75**
☐	Inspections and tests required are not in accordance with written procedures developed for the facility.- *112.7(e)*	**$75**
☐	No Inspection records were available for review- *112.7(e)* - Written procedures and/or a record of inspections and/or customary business records:	**$200**
☐	Are not signed by appropriate supervisor or inspector- *112.7(e)*	**$75**
☐	Are not maintained for three years- *112.7(e)*	**$75**
	PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES: §112.7(f)	
☒	No training on the operation and maintenance of equipment to prevent discharges and for facility operations - *112.7(f)(1)*	**$75**
☒	No training on discharge procedure protocols- *112.7(f)(1)*	**$75**
☒	No training on the applicable pollution control laws, rules, and regulations and/or SPCC plan- *112.7(f)(1)*	**$75**
☒	No designated person accountable for spill prevention - *112.7(f)(2)*	**$75**
☒	Spill prevention briefings are not scheduled and conducted at least once a year- *112.7(f)(3)*	**$75**
☐	Plan has inadequate or no discussion of personnel training and spill prevention procedures - *112.7(a)(1)*	**$75**
	SECURITY (excluding Production Facilities): §112.7(g)	
☐	Plan does not describe how the facility secures and controls access to the oil handling, processing and storage areas- *112.7*(g)	**$150**
☐	Master flow and drain valves not secured- *112.7(g)*	**$300**
☐	Starter controls on oil pumps not secured to prevent unauthorized access - *112.7(g)*	**$75**
☐	Out-of-service and loading/unloading connections of oil pipelines not adequately secured- *112.7(g)*	**$75**
☐	Plan does not address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges- *112.7(g)*	**$150**
	FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK: §112.7(h)	
☐	Inadequate secondary containment, and/ or rack drainage does not flow to catchment basin, treatment system, or quick drainage system- *112.7(h)(1)*	**$750**
☐	Containment system does not hold at least the maximum capacity of the largest single compartment of any tank car or tank truck - *112.7(h)(1)*	**$450**

☐	There are no interlocked warning lights, or physical barrier system, or warning signs, or vehicle brake interlock system to prevent vehicular departure before complete disconnect from transfer lines- *112.7(h)(2)*	**$300**
☐	There is no inspection of lowermost drains and all outlets prior to filling and departure of any tank car or tank truck- *112.7(h)(3)*	**$150**
☐	Plan has inadequate or no discussion of facility tank car and tank truck loading/unloading *rack-112.7(a)(1)*	**$75**
	QUALIFIED OIL OPERATIONAL EQUIPMENT: §112.7(k)	
☐	Failure to establish and document procedures for inspections or a monitoring program to detect equipment failure and/or a discharge - *112.7(k)(2)(i)*	**$150**
☐	Failure to provide an oil spill contingency plan- *112.7(k)(2)(ii)(A)*	**$150**
☐	No written commitment of manpower, equipment, and materials - *112.7(k)(2)(ii)(B)*	**$150**
	FACILITY DRAINAGE: §112.8(b) & (c) and/or §112.12(b) & (c)	
☐	Two "lift" pumps are not provided for more than one treatment unit- *112.8(b)(5)*	**$50**
☐	Secondary Containment circumvented due to containment bypass valves left open and/or pumps and ejectors not manually activated to prevent a discharge - *112.8(b)(1)&(2) and 112.8(c)(3)(i)*	**$600**
☐	Dike water is not inspected prior to discharge and/or valves not open & resealed under responsible supervision - *112.8(c)(3)(ii)&(iii)*	**$450**
☐	Adequate records (or NPDES permit records) of drainage from diked areas not maintained- *112.8(c)(3)(iv)*	**$75**
☐	Drainage from undiked areas do not flow into catchment basins ponds, or lagoons, or no diversion systems to retain or return a discharge to the facility - *112.8(b)(3)&(4)*	**$450**
☐	Plan has inadequate or no discussion of facility drainage - *112.7(a)(1)*	**$75**
	BULK STORAGE CONTAINERS: § 112.7(i), §112.8(c) and/or §112.12(c)	
☐	Failure to conduct evaluation of field-constructed aboveground containers for risk of discharge or failure due to brittle fracture or other catastrophe - *112.7(i)*	**$300**
☐	Material and construction of containers not compatible with the oil stored and the conditions of storage such as pressure and temperature- *112.8(c)(1)*	**$450**
☒	Secondary containment capacity is inadequate - *112.8(c)(2)*	**$750**
☒	Secondary containment systems are not sufficiently impervious to contain *oil- 112.8(c)(2)*	**$375**
☐	Completely buried metallic tanks are not protected from corrosion or are not subjected to regular pressure testing - *112.8(c)(4)*	**$150**
☐	Buried sections of partially buried metallic tanks are not protected from corrosion- *112.8(c)(5)*	**$150**
☒	Above ground containers are not subject to periodic integrity testing techniques such as visual inspections, hydrostatic testing, or other nondestructive testing methods- *112.8(c)(6)*	**$450**
☒	Above ground tanks are not subject to visual inspections- *112.8(c)(6)*	**$450**
☒	Records of inspections (or customary business records) do not include inspections of container supports/foundation, signs of container deterioration, discharges and/or accumulations of oil inside diked areas - *112.8(c)(6)*	**$75**
☐	Steam return /exhaust of internal heating coils that discharge into an open water course are not monitored, passed through a settling tank, skimmer, or other separation system- *112.8(c)(7)*	**$150**

☒	Container installations are not engineered or updated in accordance with good engineering practice because none of the following are present - *112.8(c)(8)* high liquid level alarm with audible or visual signal, or audible air vent - *112.8(c)(8)(i)* high liquid level pump cutoff devices set to stop flow at a predetermined level- *112.8(c)(8)(ii)* direct audible or code signal communication between container gauger and pumping station- *112.8(c)(8)(iii)* fast response system for determining liquid level of each bulk storage container, or direct vision gauges with a person present to monitor gauges and the overall filling of bulk storage containers- *112.8(c)(8)(iv)*	**$450**
☐	No testing of liquid level sensing devices to ensure proper operation - *112.8(c)(8)(v)*	**$75**
☐	Effluent treatment facilities not observed frequently to detect possible system upsets that could cause a discharge as described in §112.1(b) - *112.8(c)(9)*	**$150**
☐	Causes of leaks resulting in accumulations of oil in diked areas are not promptly corrected- *112.8(c)(10)*	**$450**
☐	Mobile or portable storage containers are not positioned or located to prevent discharged oil from reaching navigable water, or have inadequate secondary containment- *112.8(c)(11)*	**$150**
☐	Secondary containment inadequate for mobile or portable storage tanks- *112.8(c)(11)*	**$500**
☐	Plan has inadequate or no discussion of bulk storage tanks - *112.7(a)(l)*	**$75**
	FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS: §112.8(d) and §112.12(d)	
☐	Buried piping is not corrosion protected with protective wrapping, coating, or cathodic protection - *112.8(d)(l)*	**$150**
☐	Corrective action is not taken on exposed sections of buried piping when deterioration is found - *112.8(d)(1)*	**$450**
☐	Not-in-service or standby piping is not capped or blank-flanged and marked as to origin- *112.8(d)(2)*	**$75**
☒	Pipe supports are not properly designed to minimize abrasion and corrosion, and allow for expansion and contraction - *112.8(d)(3)*	**$75**
☐	Above ground valves, piping and appurtenances are not inspected regularly- *112.8(d)(4)*	**$300**
☐	Periodic integrity and leak testing of buried piping is not conducted at time of installation, modification, construction, relocation, or replacement- *112.8(d)(4)*	**$150**
☐	Vehicle traffic is not warned of aboveground piping or other oil transfer operations- *112.8(d)(5)*	**$150**
☐	Plan has inadequate or no discussion of facility transfer operations, pumping, and facility process- *112.7(a)(l)*	**$75**
	TOTAL	**$3,125**